

NO. UWY-CV-14-6026552-S

NUCAP INDUSTRIES, INC. <u>et al.</u> ,)	SUPERIOR COURT
)	
Plaintiffs,)	J.D. OF WATERBURY
)	
V.)	
)	
PREFERRED TOOL AND DIE, INC., et al.,)	
)	
Defendants.)	MARCH 25, 2015

**DEFENDANTS' COVER SHEET TO OBJECTIONS AND
RESPONSES TO PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION**

Pursuant to P.B. 1998 § 13-10(b), Defendants Preferred Tool and Die, Inc. and Preferred Automotive Components, a division of Preferred Tool and Die ("Defendants") hereby submit this cover sheet to their objections to Plaintiffs Nucap Industries, Inc. ("Nucap") and Nucap US, Inc. ("Nucap US") (collectively "Plaintiffs") December 23, 2014 First Set of Requests for Production. Defendants have objected in whole or in part to Requests 1-25. Defendants have responded in whole or in part to Requests 1-25.

THE DEFENDANTS
PREFERRED TOOL AND DIE, INC. and
PREFERRED AUTOMOTIVE COMPONENTS
BY THEIR ATTORNEYS

/s/ Benjamin J. Lehberger (Juris No. 425026)
Gene S. Winter
Benjamin J. Lehberger
St. Onge Steward Johnston & Reens LLC
986 Bedford Street
Stamford, Connecticut 06905-5619
(203) 324-6155
Firm Juris No. 053148

Stephen J. Curley (of counsel)
Brody Wilkinson PC
2507 Post Road
Southport, CT 06890
(203) 319-7100
Juris No. 102917

ORDER

The foregoing objections having been heard this ____ day of ____, 2015, it is hereby ordered as follows:

1. Objection to Request 1 is SUSTAINED/OVERRULED;
2. Objection to Request 2 is SUSTAINED/OVERRULED;
3. Objection to Request 3 is SUSTAINED/OVERRULED;
4. Objection to Request 4 is SUSTAINED/OVERRULED;
5. Objection to Request 5 is SUSTAINED/OVERRULED;
6. Objection to Request 6 is SUSTAINED/OVERRULED;
7. Objection to Request 7 is SUSTAINED/OVERRULED;
8. Objection to Request 8 is SUSTAINED/OVERRULED;
9. Objection to Request 9 is SUSTAINED/OVERRULED;
10. Objection to Request 10 is SUSTAINED/OVERRULED;
11. Objection to Request 11 is SUSTAINED/OVERRULED;
12. Objection to Request 12 is SUSTAINED/OVERRULED;
13. Objection to Request 13 is SUSTAINED/OVERRULED;
14. Objection to Request 14 is SUSTAINED/OVERRULED;
15. Objection to Request 15 is SUSTAINED/OVERRULED;
16. Objection to Request 16 is SUSTAINED/OVERRULED;
17. Objection to Request 17 is SUSTAINED/OVERRULED;
18. Objection to Request 18 is SUSTAINED/OVERRULED;
19. Objection to Request 19 is SUSTAINED/OVERRULED;
20. Objection to Request 20 is SUSTAINED/OVERRULED;
21. Objection to Request 21 is SUSTAINED/OVERRULED;
22. Objection to Request 22 is SUSTAINED/OVERRULED;
23. Objection to Request 23 is SUSTAINED/OVERRULED;
24. Objection to Request 24 is SUSTAINED/OVERRULED; and
25. Objection to Request 25 is SUSTAINED/OVERRULED.

Judge/Assistant Clerk

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was sent via electronic delivery, pursuant to express written consent, on this 25th day of March, 2015, to all counsel and pro se parties of record, including:

Stephen W. Aronson, Esq.
Nicole H. Najam, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597

Lawrence H. Pockers, Esq.
Harry M. Byrne, Esq.
Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103

David A. DeBassio, Esq.
Hinckley Allen & Snyder LLP
20 Church Street
Hartford, CT 06103

/s/ Jessica L. White

Jessica L. White

NO. UWY-CV-14-6026552-S

NUCAP INDUSTRIES, INC. et al.,)	SUPERIOR COURT
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Plaintiffs,)	J.D. OF WATERBURY
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v.)	
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PREFERRED TOOL AND DIE, INC., et al.,)	
)	
Defendants.)	MARCH 25, 2015

**DEFENDANTS PREFERRED TOOL AND DIE, INC., AND PREFERRED
AUTOMOTIVE COMPONENTS' RESPONSES AND OBJECTIONS TO PLAINTIFFS'
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Practice Book § 13-10, Defendants Preferred Tool and Die, Inc, and Preferred Automotive Components (a d/b/a of Preferred Tool and Die, Inc.) (collectively “Preferred” or “Defendant”), by and through their attorneys, hereby respond and object to Plaintiffs Nucap Industries, Inc. and Nucap US, Inc.’s (“Nucap” or “Plaintiffs”) First Set of Requests for Production of Documents, dated December 23, 2014.

DOCUMENT REQUESTS

REQUEST NO. 1:

All documents concerning or referenced in Preferred’s responses to Plaintiffs’ First Set of Interrogatories Directed to Preferred.

RESPONSE TO REQUEST NO. 1:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that

any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 2:

All documents in the personnel files for Bosco, Dambrauskas, Reynolds, Mike Chasse and/or Don Chasse, and any other former employee of NUCAP or Nucap US who is a current employee, contractor, agent, officer, designee, or affiliate of Preferred.

RESPONSE TO REQUEST NO. 2:

Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order. Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 3:

All documents concerning NUCAP, Nucap US, or products of NUCAP or Nucap US that Bosco, Dambrauskas, Reynolds, Mike Chasse, Don Chasse and/or any other former employee of NUCAP or Nucap US provided to Preferred.

RESPONSE TO REQUEST NO. 3:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any

other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant states that Preferred has no such documents.

REQUEST NO. 4:

All documents concerning NUCAP, Nucap US, or products of NUCAP or Nucap US that Preferred received from any source.

RESPONSE TO REQUEST NO. 4:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant states that Preferred has no such documents.

REQUEST NO. 5:

All documents concerning Preferred's marketing, business plans, strategies, and/or models regarding the manufacture, design, or sale of automotive brake components, including but not limited to friction products, shims, brakes, brake pads, caliper hardware and/or related parts and services, including, without limitation, any decision or strategy by Preferred to enter the market for the manufacture, design, or sale of automotive brake components.

RESPONSE TO REQUEST NO. 5:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 6:

All documents concerning Preferred's activities at the SAE Brake Colloquium, including, but not limited to, all meetings relating to automotive brake components, including but not limited to friction products, shims, brakes, brake pads, caliper hardware and/or related parts and services marketed, promoted, offered, sold, or sponsored by Preferred at the SAE Brake Colloquium.

RESPONSE TO REQUEST NO. 6:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 7:

All documents concerning Preferred's design, conception, creation, or date of first manufacturing of automotive brake components, including but not limited to friction products, shims, brakes, brake pads, caliper hardware and/or related parts and services, including, but not limited to, the design, conception, or creation of the following specific products:

- a. Part #20022.01
- b. Part #20224.01
- c. Part #10041.01
- d. Part #20023. 01
- e. Part #10040.01
- f. Part #10020.01
- g. Part #20002.02
- h. Part #20017.02
- i. Part #20003.02
- j. Part #20018.02
- k. Part #10009.01

RESPONSE TO REQUEST NO. 7:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 8:

All documents concerning design plans, drawings, specifications, product brochures, material data sheets, and samples for any automotive brake components, including but not limited to friction products, shims, brakes, brake pads, caliper hardware and/or related parts and services currently offered for sale by Preferred, currently in development by Preferred, or which Preferred intends to offer for sale in the future.

RESPONSE TO REQUEST NO. 8:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 9:

All documents concerning Preferred's "product portfolio," as referenced in the Dambrauskas Letter, including, but not limited to any automotive brake components, including but not limited to friction products, shims, brakes, brake pads, caliper hardware and/or related

parts and services currently offered for sale by Preferred, currently in development by Preferred, or which Preferred intends to offer for sale in the future.

RESPONSE TO REQUEST NO. 9:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 10:

All documents concerning projected or actual monthly sales by Preferred, from January 1, 2012 to the present, of automotive brake components, including but not limited to friction products, shims, brakes, brake pads, caliper hardware and/or related parts and services, broken down by amounts, dates, customers to whom the sales were made, and the specific types of products sold.

RESPONSE TO REQUEST NO. 10:

Defendant objects to the format requirements of the request, and will produce documents as they are kept in the ordinary course of business. Defendant also objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 11:

All communications between Bosco, Dambrauskas, Reynolds, Mike Chasse and/or Don Chasse with any of Plaintiffs' Customers.

RESPONSE TO REQUEST NO. 11:

Defendant objects to the phrase "Plaintiff's Customers" as vague, ambiguous, overly broad, compound, and not reasonably calculated to lead to the discovery of admissible evidence. Defendant also objects to this request to the extent that it seeks information within Plaintiff's knowledge, custody, or control. Defendant will provide a response after Plaintiff identifies such customers to Defendant. Defendant also objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 12:

All documents concerning Preferred's solicitation, recruitment, and/or hiring of Bosco, Dambrauskas, Reynolds, Mike Chasse and/or Don Chasse, and any other current or former employee of Plaintiffs, including, but not limited to, communications, offer sheets, job applications, interviews, resumes, memoranda of understanding, compensation terms, terms of employment, contracts, employment agreements, job responsibilities, account and/or territory

coverage, notes, the current or former employees' status with NUCAP or Nucap US, their obligations to NUCAP or Nucap US, their special knowledge and training, their potential customers and their start dates.

RESPONSE TO REQUEST NO. 12:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order. Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 13:

All documents, including but not limited to communications, Preferred sent to or received from Bosco from January 1, 2012 to the present.

RESPONSE TO REQUEST NO. 13:

Defendant objects to this request as over broad and seeking information not relevant to any claim or defense of any party to the extent it seeks communications after the expiration of Bosco's non-compete agreement with Plaintiff.

Subject to these objections, Defendant will produce responsive documents prior to such date, if any, that can be located after a reasonable search.

REQUEST NO. 14:

All documents concerning or describing Bosco's current and/or past role, responsibilities and/or affiliation with Preferred, including but not limited to the type of relationship, position or job title(s), and scope or services or job responsibilities.

RESPONSE TO REQUEST NO. 14:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request as over broad and seeking information not relevant to any claim or defense of any party to the extent it seeks information concerning any role after the expiration of Bosco's non-compete agreement with Plaintiff. Further, Bosco is not and has never been employed by or affiliated with Preferred, therefore no such documents exist.

REQUEST NO. 15:

All documents concerning or describing Dambrauskas' current and/or past role, responsibilities and/or affiliation with Preferred, including but not limited to job title(s), job responsibilities and dates when each job title was held.

RESPONSE TO REQUEST NO. 15:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be

issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 16:

All documents concerning or describing Reynolds' current and/or past role, responsibilities and/or affiliation with Preferred, including but not limited to job title(s), job responsibilities and dates when each job title was held.

RESPONSE TO REQUEST NO. 16:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order. Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 17:

All documents concerning or describing Mike Chasse's current and/or past role, responsibilities and/or affiliation with Preferred, including but not limited to job title(s), job responsibilities and dates when each job title was held.

RESPONSE TO REQUEST NO. 17:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order. Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 18:

All documents concerning or describing Don Chasse's current and/or past role, responsibilities and/or affiliation with Preferred, including but not limited to job title(s), job responsibilities and dates when each job title was held.

RESPONSE TO REQUEST NO. 18:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be

issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 19:

All documents concerning any fees, compensation, commission, remuneration, and/or benefits offered, demanded, and/or accepted by Bosco, Dambrauskas, Reynolds, Mike Chasse and/or Don Chasse from Preferred, including, but not limited to, W-2 forms, 1099 forms, payroll stubs, commission statements, and any arrangement regarding the payment of legal fees or the payment of any judgment in connection with any potential litigation brought by Plaintiffs.

RESPONSE TO REQUEST NO. 19:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order. Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 20:

All documents concerning agreements between Bosco and Preferred Automotive and/or Preferred Tool, including but not limited to employment agreements, restrictive covenant agreements, confidentiality agreements, stockholders agreement, partnership agreement, joint venture agreement, consulting agreement, and/or indemnification agreements.

RESPONSE TO REQUEST NO. 20:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request as over broad and seeking information not relevant to any claim or defense of any party to the extent it seeks information concerning any agreements after the expiration of Bosco's non-compete agreement with Plaintiff. Further, Bosco is not and has never been employed by or affiliated with Preferred, therefore no such documents exist.

REQUEST NO. 21:

All documents concerning agreements between Dambrauskas and Preferred Automotive and/or Preferred Tool, including but not limited to employment agreements, restrictive covenant agreements, confidentiality agreements, and/or indemnification agreements.

RESPONSE TO REQUEST NO. 21:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be

issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 22:

All documents concerning agreements between Reynolds and Preferred Automotive and/or Preferred Tool, including but not limited to employment agreements, restrictive covenant agreements, confidentiality agreements, and/or indemnification agreements.

RESPONSE TO REQUEST NO. 22:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order. Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 23:

All documents concerning agreements between Mike Chasse and Preferred Automotive and/or Preferred Tool, including but not limited to employment agreements, restrictive covenant agreements, confidentiality agreements, and/or indemnification agreements.

RESPONSE TO REQUEST NO. 23:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order. Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 24:

All documents concerning agreements between Don Chasse and Preferred Automotive and/or Preferred Tool, including but not limited to employment agreements, restrictive covenant agreements, confidentiality agreements, and/or indemnification agreements.

RESPONSE TO REQUEST NO. 24:

Defendant objects to this request to the extent it seeks information protected by the attorney-client privilege, the community of interest doctrine, the work product doctrine, or any other applicable law, privilege or immunity. Defendant objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search once a suitable protective order is entered.

REQUEST NO. 25:

All documents which Preferred may or intends to introduce at the trial of this matter.

RESPONSE TO REQUEST NO. 25:

Defendant objects to this request as premature. This case is in its early stages and Defendant has not taken any discovery or had an opportunity to evaluate the alleged use of trade secrets given that Plaintiff has not identified what trade secret information was allegedly used by Defendant. Defendant also objects to this request to the extent that any answer will likely contain confidential information, and a protective order has yet to be issued in this Action. Defendant has provided Plaintiff with a proposed protective order.

Subject to these objections, Defendant will produce responsive documents, if any, that can be located after a reasonable search later in discovery and once a suitable protective order is entered.

March 25, 2015
Dated

/s/Benjamin J. Lehberger/425026
Gene S. Winter
Benjamin J. Lehberger
Juris No. 053148
986 Bedford Street
Stamford, Connecticut
06905-5619
Telephone: (203) 324-6155
litigation@ssjr.com

Stephen J. Curley
Brody Wilkinson PC
Juris No. 102917
2507 Post Road
Southport, CT 06890
Telephone: (203) 254-1772
scurley@brodywilk.com

*ATTORNEYS FOR PREFERRED TOOL AND DIE, INC.
AND PREFERRED AUTOMOTIVE*

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2015, a copy of the foregoing DEFENDANTS
PREFERRED TOOL AND DIE, INC., AND PREFERRED AUTOMOTIVE COMPONENTS'
RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS was served via electronic mail on the following counsel of
record:

Stephen W. Aronson
Email: saronson@rc.com
Nicole H. Najam
Email: nnajam@rc.com
ROBINSON & COLE LLP
280 Trumbull Street
Hartford, CT 06103

Lawrence H. Pockers
Email: lhpoickers@duanemorris.com
Harry M. Byrne
Email: hmbyrne@duanemorris.com
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, PA 19103

03/25/2015
Date

/s/ Jessica L. White
Jessica L. White